

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRANDON SMJETANA and SKYCOIN
GLOBAL FOUNDATION LIMITED, a
Singapore company, and SYMBOLIC
ANALYTICS INC. a Delaware Corporation

Plaintiffs,

v.

BRADFORD STEPHENS, AARON
KUNSTMAN, HARRISON GEVIRTZ, f/k/a
“HaRRO”, RYAN EAGLE, ANDREW YOUNG,
FAR AHEAD MARKETING, JOEL WAYNE
CUTHRIELL f/k/a “JOEL”, MORGAN PECK,
TRISTAN GREENE, BRYAN CLARK,
CATHERINE BYERLY, STEVEN LEONARD,
JOSH OGLE, and UNKNOWN INDIVIDUALS
AND COMPANIES

Defendants.

Case No.: 1:22-cv-00708

**DECLARATION OF JOSHUA OGLE IN
SUPPORT OF DEFENDANT FAR AHEAD
MARKETING’S MOTION TO DISMISS
UNDER FEDERAL RULE OF CIVIL
PROCEDURE 12(b)(2) FOR LACK OF
PERSONAL JURISDICTION**

Presentment Date: April 7, 2022
Time: 1:45 p.m.
Location: 1403

Hon. Sara L. Ellis

**NO ORAL ARGUMENT UNLESS
REQUESTED BY THE COURT**

DECLARATION OF JOSHUA OGLE

I, Joshua Ogle, declare as follows:

1. I am over eighteen and a resident of the State of New York. I submit this declaration in support of Far Ahead Marketing, LLC’s Federal Rule of Civil Procedure Rule 12(b)(2) motion to dismiss for lack of personal jurisdiction in the lawsuit titled *Brandon Smietana et al v. Bradford Stephens, et al*, pending in the United States District Court for the Northern District of Illinois, Case No. 1:22-cv-00708. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. By making this declaration in support of that motion, I am not consenting the personal jurisdiction of the Northern District of Illinois. Indeed, this declaration is being submitted to show that, just like I do not have any contacts with Illinois, Far Ahead does not have any contacts with the Northern District of Illinois.

3. Far Ahead Marketing, LLC ("Far Ahead") is a Limited Liability Corporation incorporated under the laws of Wyoming. Attached as Exhibit A to this Declaration is a true and correct copy of Far Ahead's Limited Liability Company, Articles of Incorporation filed with the Wyoming Secretary of State on October 14, 2011. Since the filing of those articles, Far Ahead has been a Wyoming Limited Liability Company.

4. I am a Member of Far Ahead and its Manager.

5. Far Ahead's main office and principal place of business is in New York, New York.

6. Far Ahead's agent for service of process is Registered Agents, Inc., a corporation located in Sheridan, Wyoming.

7. Far Ahead does not maintain any offices in Illinois. None of its members live in or are otherwise citizens of Illinois. Far Ahead does not employ anyone in Illinois. It does not and has not contracted for services with any independent contractors in Illinois. It does not advertise for business in Illinois. It has never entered any contracts to perform services in Illinois. It has never entered any contracts to perform services for a company based in Illinois. It has never entered any contracts with an Illinois company for that company to perform services for Far Ahead. It has not knowingly transacted any business with any entity in Illinois. Simply put, Far Ahead does not engage in any business in Illinois or specifically directed at Illinois.

8. Far Ahead does not have an agent for service of process designated in Illinois. It does not maintain any bank accounts in Illinois. It has never received funds, including wire transfers, from any entity, including any bank, located in Illinois. Far Ahead does not contract for or receive services from any Illinois entity or individual.

9. To the extent Far Ahead had any contacts with the Plaintiffs, it was through Brandon Smietana, when Smietana was in China. No representative of Far Ahead ever met with

Smietana in Illinois, ever believed they were speaking with Smietana when he was in Illinois, and Far Ahead never entered a contract for services with any Plaintiff while any Plaintiff or Plaintiff representative was known to be in Illinois.

10. Aside from me, Far Ahead has not been engaged by, engaged, or had any relationship, business or otherwise, with any of the other named Plaintiffs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 1st day of April 2022, at New York, New York.

DocuSigned by:

9807670259F14E9...

Joshua Ogle